



Thurston Community Television
440 Yaeger Way SW, Suite C
Olympia WA 98502

August 5, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming
Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking
(FCC 13-77)*

Dear Commissioners:

Thurston Community Television submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Thurston Community Television is a nonprofit, community media center serving greater Thurston County, Washington. We manage four local cable channels airing more than 15,000 hours of public, educational, and governmental access programming each year. Our programming is available to approximately 65,000 cable subscribers in Olympia, Lacey, Tumwater, Yelm and unincorporated Thurston County, Washington.

We carry programs which include closed captioning such as "Democracy Now!", "Classic Arts Showcase", "NASA Connect", and "Northwest Indian News" on our channels.. The onscreen video programming guide of our multichannel video programming distributor (MVPD), Comcast Cable, does not provide a label or symbol indicating that these programs have closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Comcast Cable only provides a generic channel identification for each channel and no specific program schedule information on the electronic guide. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). We have asked Comcast to include our schedule information on the electronic guide. They respond that they are not required to do so. Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

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